

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO. 1:11 CR 00070
)	
Plaintiff)	JUDGE DAVID D. DOWD, JR.
)	
-vs-)	
)	
MATTHEW J. HOLLAND)	MOTION TO CONTINUE
)	TRIAL AND MOTION DEADLINE
Defendant)	DATES

Now comes Defendant, Matthew Holland, by and through counsel, and hereby moves this Honorable Court for an Order continuing the trial and motion deadline dates in the within matter. The reasons in support of this request are contained in the brief attached hereto.

Respectfully submitted,

s/John P. Hildebrand, Sr.
JOHN P. HILDEBRAND, SR. (0025124)
Attorney for Defendant, Matthew Holland
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CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the foregoing Motion to Continue Trial and Motion Deadline Dates has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

s/ John P. Hildebrand, Sr.
JOHN P. HILDEBRAND, SR. (0025124)
Attorney for Defendant, Matthew Holland
JOHN P. HILDEBRAND CO., LPA

BRIEF

Trial in the instant case is set for April 25, 2011, and the deadline for motion submissions is April 4, 2011. Counsel has recently received discovery which may raise a suppression issue and the need to file a motion addressing the same. Counsel has just completed a two and one-half week aggravated murder trial and has a vacation scheduled for March 26, through April 10, 2011. Due to counsel's trial schedule, vacation and the press of other business, counsel cannot properly prepare and file a suppression brief by April 4, 2011.

A continuance of the motion submission deadline and trial date for a reasonable period would enable this Defendant to raise his suppression issue and provide the Government with a reasonable period of time for response. This continuance would serve the ends of justice and outweigh the public's and Defendant's interest in a speedy trial.

Counsel has spoken with Assistant U. S. Attorney, Phillip Tripi, and he has no objection to this request.

s/ John P. Hildebrand, Sr.
JOHN P. HILDEBRAND, SR. (0025124)
Attorney for Defendant, Matthew Holland
JOHN P. HILDEBRAND CO., LPA